

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-293-JRG
vs.)	
)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO, LTD;)	(Lead Case)
SAMSUNG ELECTRONICS AMERICA,)	
INC.; SAMSUNG SEMICONDUCTOR)	
INC.,)	
)	
Defendants.)	

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-294-JRG
vs.)	
)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.; MICRON)	
SEMICONDUCTOR PRODUCTS, INC.;)	
MICRON TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	

**DECLARATION OF YANAN ZHAO IN SUPPORT OF NETLIST, INC.'S
MOTION TO COMPEL MICRON DEFENDANTS' RESPONSES TO
PLAINTIFF'S INTERROGATORY NOS. 5, 6, 12, 17, 19, 24, AND 25**

I, Yanan Zhao, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel for Plaintiff Netlist, Inc. (“Netlist”) in the above captioned action. I am a member of good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist’s Motion to Compel Micron Defendants’ Responses to Plaintiff’s Interrogatory Nos. 5, 6, 12, 17, 19, 24, and 25.

2. Attached as **Exhibit 1** is a true and correct excerpted copy of Micron’s Fourth Supplemental Responses and Objections to Netlist’s First Set of Amended Interrogatories (Nos. 1-20), which was served on November 14, 2023.

3. Attached as **Exhibit 2** is a true and correct excerpted copy of Micron’s First Supplemental Responses and Objections to Netlist’s Second Set of Amended Interrogatories (Nos. 21-31), which was served on November 17, 2023.

4. Attached as **Exhibit 3** is a true and correct excerpted copy of Netlist’s Responses and Objections to Micron’s Second Set of Interrogatories (Nos. 16-32), which was served on November 13, 2023.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 20, 2023, in Los Angeles, California.

By /s/ Yanan Zhao
Yanan Zhao